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*Attorneys for Defendant Capital One, N.A.,
erroneously sued as "Capital One Financial Corporation"*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIEKA BROWN,

Plaintiff,

V.

TRANS UNION, LLC; EXPERIAN INFORMATION SOLUTIONS, INC.; NATIONAL CONSUMER TELECOM & UTILITIES EXCHANGE, INC.; INNOVIS DATA SOLUTIONS, INC.; CLARITY SERVICES, INC.; CAPITAL ONE FINANCIAL CORPORATION; SYNOVUS BANK DBA FIRST PROGRESS AND SANTANDER CONSUMER USA INC..

Defendants.

CASE NO.: 2:25-CV-00013-JCM-DJA

JOINT MOTION

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT CAPITAL ONE,
N.A. TO FILE RESPONSIVE PLEADING
TO COMPLAINT**

(FIRST REQUEST)

Pursuant to Local Rules 6-1 and 6-2, Plaintiff Tieka Brown (“Plaintiff”) and Defendant Capital One, N.A., erroneously sued as “Capital One Financial Corporation” (“Capital One” and together with Plaintiff, the “Parties”) stipulate and agree as follows:

WHEREAS:

1. On or about January 16, 2025, Capital One was served with the Summons and Complaint for the above-referenced matter;
 2. On January 22, 2025, counsel for Capital One reached out to Plaintiff's counsel to gather further information regarding Plaintiff's claims and explore the potential for an early

1 resolution;

2 3. On January 31, 2025, the Parties agreed that good cause exists to extend Capital
 3 One's responsive pleading deadline to allow the parties to continue to devote resources to
 4 exploring the potential for early resolution of this matter;

5 4. The Parties agree to extend the deadline for Capital One to file its responsive
 6 pleading to the Complaint to February 20, 2025;

7 5. This stipulation is made in good faith and not for the purpose of delay; and

8 6. This is the first stipulated request to extend Capital One's responsive pleading
 9 deadline.

10 **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

11 Capital One's time to file a responsive pleading to Plaintiff's Complaint is extended.
 12 Capital One shall file its responsive pleading on or before February 20, 2025.

13 .

14 DATED this 3rd day of February, 2025.

15 McDONALD CARANO LLP

16 By: /s/ Karyna M. Armstrong

17 Aaron D. Shipley (NSBN 8258)
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 Las Vegas, Nevada 89102

20 *Attorneys for Defendant Capital One,
 N.A., erroneously sued as "Capital One
 Financial Corporation"*

21 DATED this 3rd day of February, 2025.

22 FREEDOM LAW FIRM, LLC

23 By: /s/ Gerardo Avalos

24 George Haines (NSBN 9411)
 Gerardo Avalos (NSBN 15171)
 8985 South Eastern Ave., Ste. 100
 Las Vegas, NV 89123

25 *Attorneys for Plaintiff Tieka Brown*

ORDER

26 Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their
 27 attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a
 28 joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the


 25 DANIEL J. ALERECHTS
 26 UNITED STATES MAGISTRATE JUDGE

27 DATED: 2/4/2025